

**SEALED**

CLERK'S OFFICE U.S. DIST. COURT  
AT CHARLOTTESVILLE, VA  
FILED

MAR 14 2007

IN THE  
UNITED STATES DISTRICT COURT  
FOR THE  
WESTERN DISTRICT OF VIRGINIA  
CHARLOTTESVILLE DIVISION  
MARCH 2007, SESSION

JOHN F. CORCORAN, CLERK  
BY: *[Signature]*  
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UNITED STATES OF AMERICA

v.

RICHARD NEAL WILLETTS

: Criminal No. 3:07-cr-00015  
:  
: In violation of:  
:  
: Title 18, United States Code  
: Sections 2251(a); 2251(e);  
: and 2422(b)

**INDICTMENT**

**Count One**

(Coercion and Enticement)

The Grand Jury charges:

That between within or about September 2005, until the return of this Indictment, in the Western Judicial District of Virginia, and elsewhere, the defendant, RICHARD NEAL WILLETTS, used a facility or means of interstate commerce to knowingly persuade, induce, entice, or coerce, or attempt to persuade, induce, entice, or coerce, one or more individuals who had not attained the age of 18 years, including a 16-year-old child, to engage in sexual activity for which a person can be charged with a criminal offense, including Va. Stat. §§ 18.2-67.3; 18.2-370.A(1); and 18.2-374.1(B)(1).

In violation of Title 18, United States Code, Section 2422(b).

Count Two

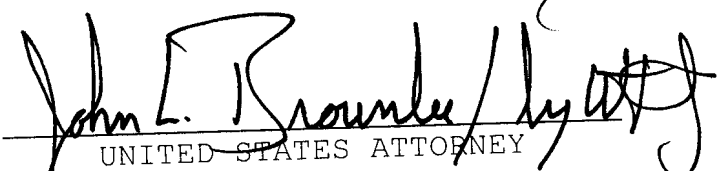
(Sexual Exploitation of Children)

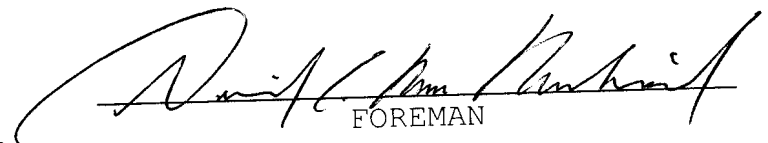
The Grand Jury charges:

That between on or about September 2, 2006, until the return of this Indictment, in the Western Judicial District of Virginia, and elsewhere, the defendant, RICHARD NEAL WILLETTS, did employ, use, persuade, induce, entice, or coerce, a minor child to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, or did attempt to do so, knowing or having reason to know, that such visual depiction would be transported in interstate or foreign commerce, or mailed, or that the visual depiction was produced using materials that had been mailed, shipped, or transported, in interstate or foreign commerce by any means, including by computer, or that such visual depiction was actually transported in interstate or foreign commerce, or mailed.

In violation of Title 18, United States Code, Section 2251(a) and 2251(e).

A TRUE BILL, this 14<sup>th</sup> day of March, 2007.

  
UNITED STATES ATTORNEY

  
FOREMAN